

RCRA COMPLIANCE AND ENFORCEMENT BRANCH ENFORCEMENT CASE RECOMMENDATION

EPA ID NUMBER: 7000585 FACILITY NAME: PEPCO Benning Rd

Generating Station

CASE REVIEW OFFICER: Jan Szaro

DATE: 03-18-08

FINDINGS OF INITIAL CASE REVIEW: Facility was inspected on February 5, 2008 by EPA Contractor Inspector. UST systems were in compliance at the time of inspection but last passing line leak tests were 0.1 gal/hr tests conducted on 2/23/07. Contacted Fariba Mahvi of PEPCO on 3/5/08 to determine if subsequent passing line leak tests had been conducted.

DISPOSITION RECOMMENDATION: CLOSE

JUSTIFICATION FOR RECOMMENDATION: In compliance at time of inspection. Documentation provided of passing annual and monthly line leak results performed on 3/6/08. The ATG did have a problem timing out while running line leak tests that was corrected on 3/6/08. Results in a less than 2 week time frame where the facility was out of compliance with ;ine leak testing requirements.

CONCURRENCE SECTION

CASE REVIEW OFFICER Jan Jar DATE: 3/18/08

TEAM LEADER DATE: 3/8/8

BRANCH CHIEF / // // // DATE: 3/9/08

RCRA Subtitle I Inspection Report

UST Compliance Inspection

Benning Road Generating Station – Vehicle Resource Management 3400 Benning Road NE Washington, DC 20010

Telephone Number: 202-331-6641 (Fariba Mahvi)

Date of Inspection: February 05, 2008

Facility Identification Number: 7000585

Facility Location: 38° 53.886N, 076° 57.485W

EPA Representative:

Andrew Loll (Contractor), Chemical Engineer, 703-

633-1645

Tank Owner:

Potomac Electric Power Company (Pepco)

Tank Owner Representative:

Fariba Mahvi, Senior Project Engineer, 202-331-6641

Andy Ross, VRM Equipment Coordinator, 302-454-

4512

Andrew I oll

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Background

On February 5, 2008, the United States Environmental Protection Agency (EPA), Region 3, Office of Enforcement, RCRA Compliance and Enforcement Branch, represented by its contractor, Andrew Loll of ERG, conducted a Compliance Evaluation Inspection (CEI) of the Benning Road Generating Station Vehicle Resource Management (VRM) fueling station located in Washington, DC to determine the extent of compliance with Subtitle I of the Resource Conservation and Recovery Act (RCRA).

Inspection Observations

Inspection Procedures. EPA Work Assignment Manager, Patricia Schwenke, contacted a representative of this facility on January 25, 2008 to schedule an inspection of the facility. Mr. Loll conducted the inspection on February 5, 2008. Upon arrival at the facility, Mr. Loll provided his credentials to Fariba Mahvi, senior project engineer, and Andy Ross, VRM Equipment Coordinator, and explained the scope and purpose of the inspection. Mr. David Whistler, VRM mechanic, and Mr. Gary Gorden, VRM Supervisor also attended the inspection and provided assistance. After completing the inspection, Mr. Loll completed the Region 3 (UST) Compliance Checklist, which is included as Attachment 1 to this report.

Tank Descriptions. The fueling station has two USTs (see Table 1), which store gasoline and diesel fuel. According to the facility's notification to the District of Columbia Environmental Health Administration, Tank 1 (gasoline) is a single-walled fiberglass reinforced plastic (FRP) tank and Tank 2 (diesel) is a steel with FRP composite (buffhide) tank. Tank 1 was installed in May 1975 and Tank 2 was installed in June 1991. Both tanks have a capacity of 20,000-gallons. Each tank has a remote fill port. Both tanks supply fuel to the dispensers via double-walled flexible plastic (FLEX) pressurized piping. See site diagram sketch in Attachment 1 and Photographs #1 and #2 in Attachment 2 for an overview of the facility.

Tank Release Detection. Releases from Tanks 1 and 2 are detected by a Veeder-Root (VR) TLS-350R monitoring system that conducts Automatic Tank Gauging (ATG). Any UST alarms appear on the VR system located in the electrical panel adjacent to the UST tanks (see Photograph #2 in Attachment 2), the facility office, and at the VR monitoring center. This station has a service contract with VR to operate and maintain the monitoring system. During the inspection, the VR monitor indicated that all systems were normal. Attachment 3 and Attachment 4 contain ATG monitoring records for the last 12 months that show all tests passed. Attachment 3 includes the FMS Site Compliance Reports from VR from March 2007 to February 2008 with the exception of April 2007. Attachment 4 contains the Precision Testing, Inc. annual automatic line leak detector (ALLD) functionality test results including printouts from the VR monitor showing the passing tank leak tests for April 2007.

K&G Petroleum Services, Inc. conducts annual inspections of the VR monitoring system and product dispensers. Attachment 5 contains the K&G inspection report from August 29, 2007 that shows the system was fine except for a defective in-tank probe on Tank 2 and an issue with some of the communication parameters in the VR monitor. Maintenance records show that the diesel probe was replace on September 20, 2007 (see Attachment 6). Precision Testing, Inc. also performed a tank tightness test on Tank 1 on June 7, 2007 which passed (see Attachment 7).

Table 1
Underground Storage Tank and Piping Details for the Benning Road Generating
Station – VRM Fueling Station

Tank No.	Material Stored	Capacity (gal.)	Installation Date	Tank Construction Material	Piping Construction Material
1 (003)	Gasoline	20,000	5/75	FRP	FLEX DW
2 (006)	Diesel	20,000	6/91	Steel w/FRP	FLEX DW

FRP - Fiberglass reinforced plastic.

FLEX - Enviroflex plastic.

DW - Double-walled.

Piping Release Detection. The pressurized piping for Tanks 1 and 2 was installed with VR electronic ALLDs. The serial numbers of the ALLDs are: Tank 1 – 220558 and Tank 2 – 220541. Precision Testing, Inc. verifies that the VR tests the functionality of the ALLDs annually. Attachment 4 contains the VR functionality test completed on August 17, 2007 showing passing results. VR conducts annual 0.1 GPH line tightness tests for both tanks. The FMS Site Compliance Reports in Attachment 3 show the latest passing line tightness test dates for both tanks.

Releases from the double-walled pressurized piping on Tanks 1 and 2 are detected by liquid sensors located in the manway access sumps. The liquid sensors are connected to the VR monitoring system. The EPA inspector tested each of the manway sump liquid sensors during the inspection by inverting the sensor which triggered an alarm on the VR monitor.

Spill/Overfill Prevention. The EPA inspector did not observe overfill cutoff valves in the remote fill ports due to a bend in each of the fill pipes directly beneath the cap. The facility representative provided photographs of the overfill cutoff valves located in the access ports for both tanks (see Photograph #3 in Attachment 2 and the site diagram sketch in Attachment 1 showing the location of the fill pipe access ports containing the

^{() -} Denotes the D.C. notification form tank ID number.

overfill cutoff valves). The EPA inspector observed an external audible overfill alarm located near the UST fill ports (see Photograph #2 in Attachment 2) and depressed the test button which triggered the audible alarm. The EPA inspector noted spill buckets, which were observed to be in good condition, surrounding the fill pipes for all the tanks during the inspection.

Cathodic Protection. The DC facility notification states that Tank 1 is FRP and Tank 2 is steel with FRP composite. The EPA inspector observed all piping entering the ground to be double-walled FLEX piping.

Financial Assurance. The facility is guaranteed/insured through Associated Electric & Gas Insurance Services Limited (Policy Number X2660A1A07). Attachment 8 contains proof of financial assurance.

Used Oil. The EPA inspector did not observe used oil tanks or drums at the VRM fueling facility.

Other USTs. The Benning Road Generating Station has multiple locations at the 3400 Benning Road NE facility that contain USTs. The other USTs are registered under the following facility identification numbers: 9000745 and 9000746.

Attachments

- 1. Region 3 UST Compliance Checklist
- 2. Photo Log
- 3. FMS Site Compliance Reports
- 4. Precision Testing, Inc. Annual ALLD Functionality Test Results and April 2007 Tank Leak Detection Results
- K&G Petroleum Services, Inc. Annual Veeder-Root Monitor and Product Dispenser Inspection Report
- 6. K&G Petroleum Services, Inc. Maintenance Records For Replacing Diesel Tank Probe
- 7. Precision Testing, Inc. Tank Tightness Testing Results for Gasoline Tank
- 8. Proof of Financial Assurance

Attachment 1. Region 3 UST Compliance Checklist

Leak Detection Inspection

I. Ownership of Tank(s)				ation of Tank(S/ (1) - 1 - 1 - 1 - 1
Potomac Electric Power Company (Pep Co 701 9th St NW, 6th Flat) Wishington DC 200068	5)	Benni 340	y Rolfewrating States P. Bonning RD NE hington DC 20010	im-32 31933	<u>दश्ड</u>
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2003		***	Milety received with a six or receive that it is the second		316 37.48311
III. Tank Information Complete for each tank	If facility has mo	-25		and complete informati	on for additional tanks.
Tank presently in use (circle)	Tank 1) os	Tank 2	Tank 3	Tank 4
If not, date last used	. ,			·	
If emptied, verify 1" or less of product in tank					
Month and Year Tank Installed	May 1975	<u>. </u>	Jun 1991		
Material of Construction tank/pipe	Pipe-Flex	P	Tenk - Stelw/FRP Pipe - Flex	<u> </u>	
Capacity of Tank (in gallons)	20,000		20,000		
Substance Stored	Casoline		Diesel		
IV.A. Release Detection For Tanks ch	eck the release de	tection	method(s) used for each	ank or N/A if none requ	ired.
Manual Tank Gauging (tanks under 1,000 gal.)	14				
Manual Tank Gauging and Tank Tightness Testing (tanks under 2,000 gal.)					
Tank Tightness Testing and Inventory Control					
Automatic Tank Gauging					
Vapor, Groundwater or Interstitial Monitoring					
Other approved method (SIR)	447	0136.50.000.7 P1900			
IV.B. Release Detection For Piping		Check	the release detection met	hod(s) used for piping.	
Check Pressurized (P) or Suction (S) Piping for each tank	P		Ρ	·	
Automatic Line Leak Detectors, and check one					
Vapor or Groundwater Monitoring					
Secondary Containment with Monitoring					
Line Tightness Testing				· · ·	
Andrew W. Loll certify that I	have inspecte	d the	above named facility		onth/day/year
Inspector's Signature: () () ()				Date: 2/8/	2008
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Leak Detection for Piping

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	Inspector's Signature: Charles (1)		Date:	18,0008	

Inventory Control and Tank Tightness Testing N/

Method of tank tightness testing:	· · · · · · · · · · · · · · · · · · ·			
Address of tank tightness tester:	· · · · · · · · · · · · · · · · · · ·			· · · · · · · · · · · · · · · · · · ·
	this facility has mo	The second secon		this page and
	Tank 1	Tank 2	Tank 3	Tank 4
Date of last tank tightness test.				
Did tank pass test? Indicate yes or no. If no, specify in comments section below the status of the tank or what actions have been taken (e.g., has state been notified?)	· .	······································		
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.			`.	
Overages or shortages are less than $1\% + 130$ gals of tank's flow-through volume.				
If no, which months were not?	oran marin 1984 and print the control of the contro			
Please answer yes or no for each question				
Owner/operator can explain inventory control methods and fig	ures used and reco	orded.	Yes 🗆	No 🗆
Records include monthly water monitoring.			Yes □	No □
Tank inventory reconciled before and after fuel delivery.			Yes □	No □
Books are reconciled monthly.			Yes □	No □
Appropriate calibration chart is used for calculating volume.		· .	Yes □	No □
Dispenser pumps are calibrated to within 6 cubic inches per fi	ve gallons.		Yes.□	No 🗆
The drop tube in the fill pipe extends to within one foot of tan	k bottom.		Yes □	No □
Owner can demonstrate consistency in dipsticking techniques			Yes □	No □
The dipstick is long enough to reach the bottom of the tank.	·		Yes □	No □
The ends of the gauge stick are flat and not worn down.			Yes □	No □
The dipstick is marked legibly & the product level can be deter	rmined to the neare	est 1/8th inch.	Yes □	No □
The tank has been tested within the year & has passed the tig	htness test (if nece	essary).	Yes □	No 🗆
A third-party certification of the tank tightness test method is	available.		Yes □	No □
Tank tester complied with all certification requirements.			Yes □	· No □
Monitoring and testing are maintained and available for the pa	st 12 months.		Yes □	No 🗆
Comments:				3
			 ;	
nspector's Signature:			Date: 3/8/	208

Facility ID Number 10058

Vapor Monitoring N/A

Name of monitoring device:		<u> </u>	· · · · · · · · · · · · · · · · · · ·	
Date system installed Number of monitoring wells		-		
Distance of monitoring well(s) from tank(s) (1)(2)	(3)		(4)	
Site assessment was conducted by:				
Location of site assessment documentation:				
Please indicate yes or no for each tank Please complete all information		The state of the s	· · · · · · · · · · · · · · · · · · ·	THE PROPERTY OF THE PARTY
please photocopy this page and		information	for additiona	tanks.
	Tank 1	Tank 2	Tank 3	Tank 4
Well is clearly marked and secured.				ļ
Well caps are tight.			<u> </u>	<u> </u>
Well is constructed so that monitoring device is not rendered inoperative by moisture or other interferences.		*- <u>-</u>		
Well is free of debris or has other indications that it has been recently checked.			ŀ	
Please answer yes or no for each guestion				
UST excavation zone was assessed prior to vapor monitoring system installation.	Yes□	No. □		
One or more USTs is/are included in system.	Yes □	No □		
If the system is automatic, check the following:				
Power box is accessible and power light is on.	Yes □	No 🗆		
Documentation of monthly readings is available for last 12 months.	Yes □	No 🗆		
Equipment used to take readings is accessible and functional.	Yes □	No □	5 (File)	
Vapor monitoring equipment has been calibrated within the last year.	Yes □	No 🗆		
If the system is manual, check the following:		Taggetter.		
Documentation of monthly readings is available for last 12 months.	Yes □	No □		
Equipment used to take readings is accessible and functional.	Yes □	No 🗆		
Vapor monitoring equipment has been calibrated within the last year.	Yes □	No 🗆		
Porous material was used for backfill.	Yes □	No □		
Wells are placed within the excavation zone.	Yes □	No □		
Level of background contamination is known. If so what is level?	Yes □	No □		2 m - 22
On the back of this sheet, please sketch the site, noting all piping runs, tanks (incluwells and their distance from tanks and piping.	uding size and	l substances	stored) and I	ocation of
Comments:				
Inspector's Signature: Ondri W. LO			Date: 🔌	R poor

Building 32

Roadway

Spare -> (Rajular -> Mornutuy

d o ∧ t	_Diesel Dispuser
5 \ 6 0 \le \le \lambda \lambda \le \lambda \lambda \le \lambda \lambda \le \lambda \lambda \le \lambda \lambda \le \lambda \lambda \le \lambda \lambda \le \lambda \lambda \le \lambda \lambda \le \lambda \lambda \le \lambda \le \lambda \le \lambda \le \lambda \le \lambd	Diesel Dispenser Tosoline Dispenser

Manual Tank Gauging リート

Manual tank gauging may be used as the sole method of leak detection only for tanks of 1,000 gal. or fewer or in combination with tank tightness testing for tanks of up to 2,000 gal.

Please indicate the number of the tank or tanks for which manual tank gauging is used as the main leak detection method (e.g., tanks Please answer yes or no for each question Records show liquid level measurements are taken at beginning and end of Yes No 🗆 period of at least ([Circle one] 36, 44, 58) hours during which no liquid is added to or removed from the tank. Level measurements are based on average of two consecutive stick readings Yes □ No □ at both beginning and end of period. Monthly average of variation between beginning and end measurements is Yes 🛚 No 🛘 less than standard shown below for corresponding size and dimensions of tank and waiting time. Gauge stick is long enough to reach bottom of the tank. Ends of gauge stick Yes No 🗆 are flat and not worn down. Gauge stick is marked legibly and product level can be determined to the Yes □ No □ nearest one-eighth of an inch. Yes MTG is used as sole method of leak detection for tank. No 🗆 Yes 🗌 No 🗆 MTG is used in conjunction with tank tightness testing. No 🗆 Are all tanks for which MTG is used under 2,000 gallons in capacity? Yes Are monitoring records available for the last 12 month period? Yes 🗆 No 🗆 Nominal Tank Capacity Tank Dimensions Monthly Standard Check One: Minimum Test (in gallons) (in gallons) Duration () 110-550 N/A 5 36 hours 551 - 1,000* 36 hours 64" diameter x 73" 1,000* 44 hours length 48" diameter x 128" 1,000* 58 hours length 1,001 -N/A 13 36 hours 2,000* Manual tank gauging must be used in combination with tank tightness testing for tanks over 550 gal. and up to 2,000 gal. Comments: Inspector's Signature:

Ground Water Monitoring N/A

·				
Date System Installed:			_ 	<u> </u>
Distance of well from tank(s) (1) (2)	ance of well from tank(s) (1) (2) (3)			
Distance of well from piping (1) (2)		(3)	(4)	
Site assessment was conducted by:	· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	
Location of site assessment documentation:				
			photocopy this page	
	Well 1	Well 2	Well 3	Well 4
Well is clearly marked and secured to avoid unauthorized access or tampering.			•	
Well was opened and presence of water was observed in well at depth of ft.				
Please answer yes or no for each question		Torrest Constitution		
Wells are used to monitor piping.			Yes □	No □
Site assessment was performed prior to installation of wells	S		Yes □	No 🗆
Documentation of monthly readings is available.			Yes □	No 🗆
Specific gravity of product is less than one.			Yes □	No □
Hydraulic conductivity of soil between UST system and mocm/sec. According to:	nitoring wells is no	ot less than 0.01	Yes □	No □
Groundwater is not more than 20 feet from ground surface.			Yes □	No □
Wells are sealed from the ground surface to top of filter page	ok.		Yes □	No 🗆
Continuous monitoring device or manual bailing method use least one-eighth of an inch of the product on top of grounds	ed can detect the p water in well.	resence of at	Yes □	No 🗆
Groundwater is monitored: () Manually on a monthly basis () Automatically (continuously		Circle one]).		
Check the following if groundwater is monitored <u>manually</u> : functional.	Bailer used is acco	essible and	Yes □	No 🗆
Check the following if groundwater is monitored automatical	ally: Monitoring bo	x is operational.	Yes □	No 🗆
Checked for presence of sensor in monitoring well.			Yes 🗆	No 🗆
On the back of this sheet, please sketch the site, noting all wells and their distance from tanks and piping.	piping runs, tanks	(including size and	substances stored)	and location of
Comments:				
			· · · · · · · · · · · · · · · · · · ·	
Inspector's Signature: (Ludiu W. 191)	angal semenanga da da saha anda kanapanga da se saha angan perakangakan	ì	Date: 3/8/2	800

Interstitial Monitoring PIA

Manufacturer and name of system:	. :		
Date system installed:			
Materials used for secondary barrier:			
Materials used for internal lining:			
Interstitial space is monitored (Circle one): automatically, continuously, monthly basis.			
Please answer yes or no for each question			
All tanks in system are fitted with secondary containment and interstitial monitoring.	Yes □	No 🗆	N/A □
System is designed to detect release from any portion of UST system that routinely contains product.	Yes □	No 🗆	N/A 🗆
Monitoring method is documented as capable of detecting a leak as small as .1 gal./hr. with at least a 95% probability of detection and a probability of false alarm of no more than 5%.	Yes □	No □	N/A 🗆
Documentation of monthly readings is available for last 12 months.	Yes □	No □	N/A 🗆
Maintenance and calibration documents and records are available and indicate appropriate maintenance procedures for system have been implemented.	Yes □	No 🗆	N/A 🗆
Monitoring box, if present, is operational.	Yes □	No □	N/A □
If monitoring wells are part of leak detection system, monitoring wells are clearly marked and secured to avoid unauthorized access and tampering.	Yes □	No □	N/A 🗆
Interstitial space is monitored manually on monthly basis (answer the following question).	Yes □	No 🗆	N/A 🗆
Equipment used to take readings is accessible and functional.	Yes □	No □	N/A 🗆
Tank is double-walled	Yes □	No □	N/A 🗆
Tank is fitted with internal bladder to achieve secondary containment (answer the following question).	Yes □	No □	N/A □
Bladder is compatible with substance stored and will not deteriorate in the presence of that substance.	Yes □	No 🗆	N/A □
Excavation is lined with impervious artificial material to achieve secondary containment (answer the following questions).	Yes □	No 🗆	N/A □
Secondary barrier is always above groundwater.	Yes □	No□	N/A 🗆
If secondary barrier is not always above groundwater, secondary barrier and monitoring designs are for use under such conditions.	Yes □	No 🗆	N/A □
Secondary barrier is constructed from artificially constructed material, with permeability to substance < 10 ⁶ cm/sec.	Yes □	No 🗆	N/A □
Secondary barrier is compatible with the regulated substances stored and will not deteriorate in presence of that substance.	Yes 🗆	No 🗆	N/A □
Secondary barrier does not interfere with operation of cathodic protection system.	Yes □	No 🗆	N/A □
Comments:			
Inspector's Signature: Onder William Date:	2/8/300	8	

Automatic Tank Gauging

Manufacturer, name and model number of system: VEOCET - NOT TLS 350 R		· .	
Please answer yes or no for each question			
Device documentation is available at site (e.g., manufacturer's brochures, owner's manual).	Yes		No [
Device can measure height of product to nearest one-eighth of an inch.	Yes		No [
Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch.	Yes		No [
Documentation is available that the ATG was in test mode a minimum of once a month.	Yes	D.	No [
Checked for presence of gauge in tanks.	Yes	₽ ·	No E
Checked for presence of monitoring box and evidence that device is working (i.e., device is equipped with roll of paper for results documentation).	Yes		No C
Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with probability of detection of 95% and probability of false alarm of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods").	Yes		No □
Checked documentation that system was installed, calibrated, and maintained according to manufacturer's instructions.	Yes	B C	No 🗀
Maintenance records are available upon request.	Yes		No □
Monthly testing records are available for the past 12 months.	Yes	P	No 🗆
Daily monitoring records are available for the past 12 months (if applicable).	Yes Yes	O I	No 🗆
Comments: Kat Petroleum Services conducts annual insperting 8/29/07 Inspection roled Tank 2 probe was defective and needed probe was replaced on 9/20/2007. Inspector's Signature: Olumber O. foll Tank I also had one tank tightness test conducted on 6/9/2007 which	- , _ , _ , _ , _ , _ , _ , _ , _ , _ , 	itaring sys e order sha	Jem.
rumin 1 also new also trank tightness test conducted on (e/7/2007 which	n passed.		

Statistical Inventory Reconciliation 214

Please complete all information for each tank. If this facility has more than 4 tanks, complete the information for all addit	A STATE OF THE PARTY OF THE PAR	(2) (4) (1) (2) (1) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.		
Please answer yes or no for each question		
Records include monthly water monitoring.	Yes □	No □
Tank inventory reconciled before and after fuel delivery.	Yes □	No 🗆
Appropriate calibration chart is used for calculating volume.	Yes□	No 🗆
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes □	No □
The drop tube in the fill pipe extends to within one foot of tank bottom.	, Yes □	No □
Answer one of the following three:		
1) Owner can demonstrate consistency in dipsticking techniques.	Yes □	No □
a) The dipstick is long enough to reach the bottom of the tank.	Yes □	No □
b) The end of the gauge stick is flat and not worn down.	Yes □	No □
c) The dipstick is legible & the product level can be determined to the nearest 1/8th inch.	Yes □	No 🗆
<u>OR</u>		
2) Automatic tank gauge is used for readings.	Yes □	No 🗆
<u>OR</u>		
3) Other method is used for readings (explain in comment section below).	Yes □	No □
A third-party certification of the SIR method is available.	Yes □	No 🗆
Monitoring and testing records are maintained and available for the past 12 months.	Yes □	No 🗆
Comments:		· .
		, ,
		÷
Inspector's Signature: Challed Co. Sall	Date:	408
	1 - 7	

Spill/C	Spill/Overfill Prevention					
	Tank 1	(ank 2)	Tank 3	Tank 4		
Are all tank transfers less than 25 gallons?	Yes 🗆 No 🔂	Yes 🗆 No 🛭	Yes ☐ No ☐	Yes ☐ No ☐		
Spill Prevention						
Is there a spill bucket (at least 5 gallons) or another device that will prevent release of product to the environment (such as a dry disconnect coupling)?	Yes 12 No □	Yes ☑ No □	Yes □ No □	Yes □ No □		
Overfill Prevention						
What device is used to prevent tank from being overfilled?						
Ball float valve	Yes ☐ No ☐	Yes □ No □	Yes □ No □	Yes ☐ No ☐		
Butterfly valve (in fill pipe)	Yes ☑ No ☐	Yes II No [Yes □ No □	Yes □ No □		
Automatic alarm monitoring is used	Yes 🗹 No 🗆	Yes ☑ No □	Yes □ No □	Yes ☐ No ☐		
Other alarm system	Yes 🗆 No 🗆	Yes ☐ No ☐	Yes □ No □	Yes ☐ No ☐		
DOES THE FACILITY HAVE A FINANCIAL ASSURANCE MED	hodic Prot	STATUS FO	RECOMMENTS AS OR 40 C.F.R. PART			
	Tank 1	Tank 2	Tank 3	Tank 4		
Sacrificial Anode System						
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes □ No □	Yes □ No □	Yes □ No □	Yes □ No □		
The last two test results are available. (Tests are required every three years.)	Yes □ No □	Yes □ No □	Yes ☐ No ☐	Yes □ No □		
Impressed Current						
Rectifier is on 24 hours a day?	Yes ☐ No ☐	Yes □ No □	Yes □ No □	Yes □ No □		
The last two test results are available? (Tests are required every 60 days.)	Yes □ No □	Yes □ No □	Yes □ No □	Yes □ No □		
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes □ No □	Yes ☐ No ☐	Yes 🗌 No 🗌	Yes ☐ No ☐		
		-				
Comments: I would I Would Associated Ele	ectric & Ges J	usulance Servi	os Limited (olicis		
# X26600A1A87 Showh 10131/08						
-D.C. notification states lank 1 is FRP and lank 2 is Bafflide (steel w/FRP composite)						
-Pains uns observed to be ON flexible plastic.						
Inspector's Signature: Puduli) Jol						
- Ka G Petroleum Services Verified the existence visually observe flapper valves as fill pipe beneath the cap.	of Flappen val	wes in each fills and the pi	ll pert. EPA insp pe had bends	ector could no directly		

Attachment 2. Photo Log

Washington, DC PHOTO LOG

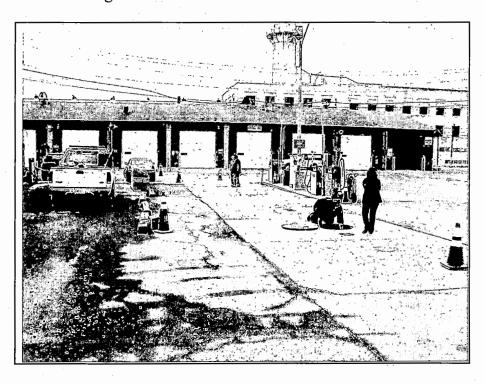
DATE TAKEN: 02/05/08 TAKEN BY: A. Loll

PHOTO #: 1

COMMENTS: Site overview: Fueling dispensers and USTs. Building 32 is located in the photograph background.

SITE LOCATION: View of Benning Road Generating Station –

VRM looking west.

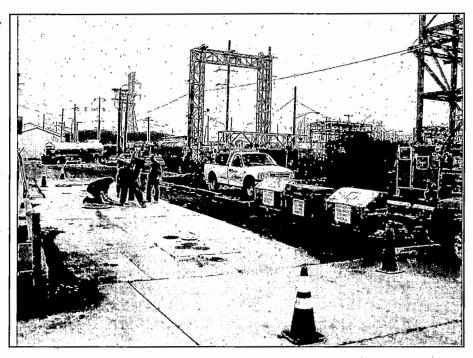


DATE TAKEN: 02/05/08 TAKEN BY: A. Loll

PHOTO #: 2

COMMENTS: Site overview: View of USTs. Veeder-Root monitor and emergency overfill alarm located in the gray electrical panel box located behind the three emergency spill kit containers in the photograph.

SITE LOCATION: View of Benning Road Generating Station - VRM looking east.



Washington, DC PHOTO LOG

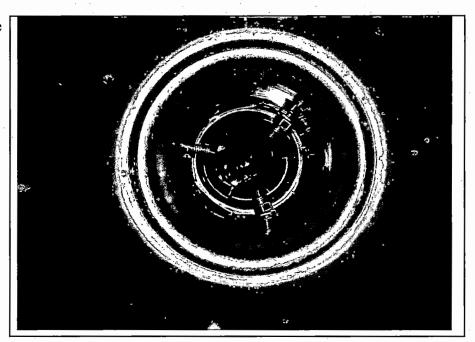
DATE TAKEN: 02/05/08

TAKEN BY: A. Loll

PHOTO #: 3

COMMENTS: Overfill cutoff valve in diesel UST remote fill pipe access port. Gasoline UST remote fill pipe access port has a similar overfill cutoff valve.

SITE LOCATION: View of Benning Road Generating Station - VRM.



Attachment 3. FMS Site Compliance Reports

GVR ID: 258178

Site Id: 20

Period: 03/01/2007 to 04/04/2007

Customer: Conectiv Eagle Run

401 Eagle Run Road

Newark, DE 19714

Site: Benning Service Ctr

3400 BENNING RD NE. **WASHINGTON, DC 20019**

Report Created: 04/04/2007 08:38 AM

Tank Release Detection Results

Tank	Product	Test Date	Туре	Full Vol	Result
1	DIESEL	03/05/2007	0.2 GPH Monthly	69%	Passed
2	UNLEADED	03/05/2007	0.2 GPH Monthly	78%	Passed

Line Release Detection Results

Line	Product	Test Date	Туре	Result
1	DIESEL	02/23/2007	0.1 GPH Annual	Passed
2	UNLEADED	02/23/2007	0.1 GPH Annual	Passed

Sensor Status

Sensor Category	Sensor Label	Test Date	Status
STP Sump	DIESEL STP SUMP	03/05/2007	Normal
STP Sump	UNLEADED STP SUMP	03/05/2007	Normal

This report documents tank and line tests performed at the above location for the indicated date and period. This report and the tests performed are part of the Conectiv Eagle Run monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirementsFuel Logistics Services VR101: Page 1 of 2

GVR ID: 258178

Period: 05/01/2007 to 05/31/2007

Site Id: Benning

Customer: Conectiv Eagle Run

401 Eagle Run Road

Site: Benning Service Ctr

Newark, DE 19714

3400 BENNING RD NE. **WASHINGTON, DC 20019**

Report Created: 02/05/2008 01:03 PM

Tank Release Detection Results

Tank	Product	Test Date	Туре	Full Vol	Result
1	DIESEL	05/31/2007	. 0.2 GPH Monthly	62%	Passed
2	UNLEADED	05/31/2007	0.2 GPH Monthly	82%	Passed
Line R	elease Detection Results				•
Line	Product	Test Date	Туре		Result
1,	DIESEL	02/23/2007	0.1 GPH Annual		Passed
2	UNLEADED	02/23/2007	0.1 GPH Annual		Passed
Sensor	Status				
Senso	r Category	Sensor Label	Test Date	•	Status
STP Su	mp	DIESEL STP SUMP	05/31/2007		Normal
STP Su	mp ·	UNLEADED STP SUMP	05/31/2007		Normal

This report documents tank and line tests performed at the above location for the indicated date and period. This report and the tests performed are part of the Conectiv Eagle Ruin monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services VR101: Page 1 of 1

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420

Period: 03/01/2007 to 02/05/2008

GVR ID: 261240 Site Id: Benning

Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Site: PHI Service Company VRM #1

3400 Benning Rd NE Washington, DC 20019

Report Created: 02/05/2008 10:59 AM

Tank Release Detection Results

Tank	Product	Test Date	Туре	Full Vol	Result
1	DIESEL	06/12/2007	0.2 GPH Monthly	50%	Passed .
2	UNLEADED	06/12/2007	0.2 GPH Monthly	73%	Passed

This report documents tank and line tests performed at the above location for the indicated date and period. This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services VR101: Page 4 of 12

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420

GVR ID: 261240

Site Id: Benning

Period: 03/01/2007 to 02/05/2008

Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Site: PHI Service Company VRM # 1

3400 Benning Rd NE Washington, DC 20019

Report Created: 02/05/2008 10:59 AM

Tank Release Detection Results

Tank	Product	Test Date	Туре	Full Vol	Result
1	DIESEL	07/06/2007	0.2 GPH Monthly	60%	Passed
2	UNLEADED	07/06/2007 .	0.2 GPH Monthly	56%	Passed

This report documents tank and line tests performed at the above location for the indicated date and period. This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

VR101: Page 5 of 12

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420

Period: 03/01/2007 to 02/05/2008

GVR ID: 261240

Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Site Id: Benning

Site: PHI Service Company VRM #1

3400 Benning Rd NE Washington, DC 20019

Report Created: 02/05/2008 10:59 AM

		-			
Tank	Product	Test Date	Туре	Full Vol	Result
1	DIESEL	08/04/2007	0.2 GPH Monthly	69%	Passed
2	UNLEADED	08/04/2007	0.2 GPH Monthly	45%	Passed

Period: 03/01/2007 to 02/05/2008

GVR ID: 261240 Site Id: Benning

Site: PHI Service Company VRM # 1

3400 Benning Rd NE Washington, DC 20019 Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714 .

Report Created: 02/05/2008 10:59 AM

Tank	Product	Test Date	Туре	Full Vol	Result	
1	DIESEL	09/04/2007	0.2 GPH Monthly	40%	Passed	
2	UNLEADED	09/04/2007	0.2 GPH Monthly	59%	Passed	

Period: 03/01/2007 to 02/05/2008

GVR ID: 261240 Site Id: Benning

Site: PHI Service Company VRM #1

3400 Benning Rd NE Washington, DC 20019 Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Report Created: 02/05/2008 10:59 AM

			*			•	
Tan	ık Product	Test Date	Туре	Full Vol	Result		
1	DIESEL	10/05/2007	0.2 GPH Monthly	55%	Passed		
2	UNLEADED	10/05/2007	0.2 GPH Monthly	78%	Passed		

GVR ID: 261240

Period: 03/01/2007 to 02/05/2008

Site Id: Benning

Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Site: PHI Service Company VRM # 1

3400 Benning Rd NE Washington, DC 20019

Report Created: 02/05/2008 10:59 AM

Tank	Product	Test Date	Туре	Full Vol	Result	·
1	DIESEL	11/13/2007	0.2 GPH Monthly	54%	Passed	
2	UNLEADED	11/13/2007	0.2 GPH Monthly	50%	Passed	

GVR ID: 261240

Site Id: Benning

Period: .03/01/2007 to 02/05/2008

Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Site: PHI Service Company VRM #1

3400 Benning Rd NE Washington, DC 20019

Report Created: 02/05/2008 10:59 AM

Tank	Product	Test Date	Туре	Full Vol	Result
1	DIESEL	12/04/2007	0.2 GPH Monthly	58%	Passed
. 2	UNLEADED	12/04/2007	0.2 GPH Monthly	53%	Passed

Period: 03/01/2007 to 02/05/2008

Site Id: Benning

Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Site: PHI Service Company VRM #1

3400 Benning Rd NE Washington, DC 20019

Report Created: 02/05/2008 10:59 AM

Tank Release Detection Results

GVR ID: 261240

THE TOTAL POWER TO THE PARTY OF									
Tan	k Product		Test Date		Туре		Full Vol	Result	
1	DIESEL		01/05/2008		0.2 GPH Monthly		58%	Passed	
2	UNLEADED		01/05/2008	:	0.2 GPH Monthly	:	58%	Passed	

Period: 03/01/2007 to 02/05/2008

GVR ID: 261240 Site Id: Benning

Site: PHI Service Company VRM # 1 3400 Benning Rd NE Washington, DC 20019

Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Report Created: 02/05/2008 10:59 AM

Tank Release Detection Results

******	Ettitude Dettetion Attounts	*			
Tanl	Product	Test Date	Туре	Full Vol	Result
1	DIESEL	02/05/2008	0.2 GPH Monthly	67%	Passed
2	UNLEADED	02/05/2008	0.2 GPH Monthly	77%	Passed

This report documents tank and line tests performed at the above location for the indicated date and period. This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services VR101: Page 12 of 12

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420

Attachment 4. Precision Testing, Inc. Annual ALLD Functionality Test Results and April 2007 Tank Leak Detection Results



K & G PETROLEUM SERVICES, INC.

P.O. BOX 134 ST. LEONARD, MD. 20685-0134

Invoice

Date	Invoice #		
8/27/2007	2463		

Bill To

DELMARVA POWER VRM P.O. BOX 9239 MAILSTOP 79NC48 ATTN:SKIP PIERCE/ KATHY SYNDER NEWARK, DE. 19714 Site Serviced

BENNING GVR ID 261240 3400 BENNING RD. N.E. WASHINGTON, D.C. 20019

		P.0	O. No.	Terms	Due Date	
				NET 30	9/26/2007	
Item	Description	Qty	Rate	Serviced	Amount	
	Building #32 at 3400 Benning Rd.			8/17/2007		
Leak Dete	Precision test electronic leak detector	2	75.00		150.00	
RESSUR	Pressure Decay Test	1	350.00		350.00	
BLOCKAGE	Phase II Balance system pressure drop during flow test & Liquid blockage test	1	300.00		300.00	
	Scope of Work Precision tested two electronic leak detectors. Performed pressure decay test and				VEHICLE RESC	
	dynamic back pressure test.				VED URCE MGMT PH 2: 24	
	 e your business! Contact us at 410-495-81 o@comcast.net	00 or	Subtota	<u> </u>	\$800.00	
Parts and equi	uipment are warranted only to the extent of 's warranty.	the	Sales T	ax (5.0%)	\$0.00	
	4.	• •	Baland	e Due	\$800.00	

Gisele Brigan

4437 Southern Business Park Drive ♦ White Plains, MD 20695 Phone 301/870-2246 ♦ Fax 301/870-2256

261240 PHI Benning 3400 Benning Road WASHINGTON DC SITE BENNING

AUG 17, 2007 12:57 PM

PRESSURE LINE LEAK TEST RESULTS

Q 1:DIESEL

3.0 GAL/HR RESULTS:

LAST TEST: AUG 17.2007 10:08AM PASS

NUMBER OF TESTS PASSED PREV 24 HOURS : 11 SINCE MIDNIGHT : 6

0.20 GAL/HR RESULTS:

APR 18.2007 7:06AM PASS APR 14.2007 8:41AM PASS APR 10.2007 9:05AM PASS APR 4.2007 6:45AM PASS MAR 25.2007 10:03PM PASS MAR 19.2007 10:16PM PASS MAR 17.2007 7:34AM PASS MAR 13.2007 3:25AM PASS MAR 9.2007 7:02AM PASS MAR 9.2007 9:50AM PASS

0.10 GAL/HR RESULTS:

FEB 23.2007 5:15PM PASS

Q 2:UNLEADED

3.0 GALZHR RESULTS:

LAST TEST: AUG 17.2007 12:36PM PASS

NUMBER OF TESTS PASSED
PREV 24 HOURS: 21
SINCE MIDNIGHT: 15

0.20 GAL/HR RESULTS:

APR 18.2007 9:12PM PASS APR 16.2007 4:28AM PASS APR 12.2007 8:30AM PASS APR 6.2007 7:16PM PASS MAR 21.2007 6:07AM PASS MAR 17.2007 10:55AM PASS MAR 7.2007 7:06AM PASS MAR 3.2007 12:34AM PASS FEB 27.2007 9:54AM PASS FEB 23.2007 6:39PM PASS

0.10 GAL/HR RESULTS:

FEB 23.2007 11:34PM PASS

PRESSURE LINE LEAK ALARM Q 1:DIESEL GROSS LINE FAIL AUG 17, 2007 1:25 PM

PRESSURE LINE LEAK ALARM Q 1:DIESEL PLLD SHUTDOWN ALARM AUG 17. 2007 1:25 PM

PRESSURE LINE LEAK ALARM Q 2:UNLEADED GROSS LINE FAIL AUG 17, 2007 1:28 PM

PRESSURE LINE LEAK ALARM Q 2:UNLEADED PLLD SHUTDOWN ALARM AUG 17, 2007 1:28 PM

261240 PHI Bennina 3400 Bennina Road WASHINGTON DC SITE BENNING

AUG 17, 2007 1:28 PM

Precision resump, mc.

4437 Southern Business Park Drive ♦ White Plains, MD 20695
Phone 301/870-2246 ♦ Fax 301/870-2256

#261240 PHI Bennina 3400 Bennina Road WASHINGTON DC SITE BENNING

AUG 17, 2007 1:35 PM

SYSTEM STATUS REPORT D 8:ALARM CLEAR WAENING

INVENTORY REPORT

T 1:DIESEL

VOLUME = 10573 GALS

-ULLAGE = 8450 CALS

90% ULLAGE = 6547 GALS

TC VOLUME = 10482 GALS

HEIGHT = 71.08 INCHES

STK HEIGHT = 70.83 INCHES

WATER VOL = 0 GALS

WATER = 1.22 INCHES

TEMP = 79.1 DEG F

T 2:UNLEADED

VOLUME = 13519 GALS

ULLAGE = 6457 GALS

90% ULLAGE = 4459 GALS

TC VOLUME = 13344 GALS

HEIGHT = 69.44 INCHES

STK HEIGHT= 70.19 INCHES

WATER VOL = 0 GALS

WATER = 0.00 INCHES

TEMP = 78.4 DEG F

* * * * * END * * * * *

SYSTEM STATUS REPORT

D 8:ALARM CLEAR WARNING

G 1: GROSS LINE FAIL

Q 1:PLLD SHUTDOWN ALARM

G 2:GROSS LINE FAIL

Q 2:PLLD SHUTDOWN ALARM

INVENTORY REPORT

T 1:DIESEL

VOLUME = 10573 GALS

ULLAGE = 8450 GALS

90% ULLAGE = 6547 GALS

TC VOLUME = 10482 GALS

HEIGHT = 71.08 INCHES

STK HEIGHT = 70.83 INCHES

WATER VOL = 0 GALS

WATER = 1.22 INCHES

TEMP = 79.1 DEG F

T 2:UNLEADED

VOLUME = 13518 GALS

ULLAGE = 6458 CALS

90% ULLAGE = 4460 GALS

TC VOLUME = 13344 CALS

HEIGHT = 69.44 INCHES

STK HEIGHT= 70.19 INCHES

WATER VOL = 0 GALS

WATER = 0.00 INCHES

TEMP = 78.4 DEG F

* * * * * EVIL * * * *

Precision Testing, Inc.

4437 Southern Business Park Drive White Plains, MD 20695 Phone 301/870-2246 Fax 301/870-2256

PHASE II BALANCE SYSTEMS PRESSURE DROP DURING FLOW TEST & LIQUID BLOCKAGE TEST

Facility ID#:

Facility Name: PEPCO - BENNING

Address: 3400 BENNING RD

WASHINGTON, D.C. 20019

Date: 8/17/07

Tester Name: Charles Beaver

Site Phone:

Site Plan		,		
	•			
		1		
	GAS		DIESEL	
		43	65 21	•
				not to scale

· — . — . — .			Flowmeter CFH	<u> </u>		
nozzle no	product		P TEST		WET TEST	COMMENTS
		20	60	100	60	
3	UNLEADED	0.02	0.18	0.40		PAS
4	UNLEADED	0.03	0.016	0.036		PAS
7	UNLEADED	0.02	0.022	0.046	+X	PAS
8	UNLEADED	0.06	0.026	0.056		PAS
1				·		
i	1		<u> </u>			

Tester Signature

Charles F Beaver, Ir.

Date of Test 8/17/07

Attachment 5. K&G Petroleum Services, Inc. Annual Veeder-Root Monitor and Product Dispenser Inspection Report

Service Order

Authorized Signature

	_ 1	Phone	Date	of Order			
K & G PETROLEUM SERVICES, IN 200 Sandhill Court	C.	PO#	Req	uested by Date			
St. Leonard, MD 20685 Phone 410-495-8100 Fax 410-495-7888		Job Name Papan - Banning					
Site arrival: 120	٥٨١٠	Joh Addrase	1	ming Red NE			
Site depart : 3:4	,	Contact Job Phone					
End Time 4:4	5pm 1						
8/29/07 Description of	Work f	-formed a	unual	fuel island			
inspections of Veeder-1	Post and	product of	spenso	/5			
The tank probe in di	esel tank	15 detec	tuc an	ul needs			
replacement.							
		1/					
Note: The TLS co.15.	le comme	sication,	<u> </u>	krs nere			
terned off, I	was able	to get F	M15 per	sonnel to			
turn back on.		, 					
		Non-	1 1 2 2 2 2				
Qty. Material	Material	Material	Labor	Labor			
	Price	Amount	Hrs. R	ate Amount			
y water absorbint sheet		Amount	Hrs. H	ate Amount			
		Amount	Hrs. F	ate Amount			
y Water absorbint sheet		Amount	Hrs. H	ate Amount			
Mise absorbent sheet		Amount	Hrs. h	ate Amount			
Mise absorbent sheet		Amount	Hrs. h	ate Amount			
Mise absorbent sheet		Amount		ate Amount			
Mise absorbent sheet		Amount	Total Labor	ate Amount			

Total

Pump Calibration Report

Date 8 / 29 / 07

Facility Name_	Pepco - Benning		
Address	3400 Benning Rd NE		
City	Washington DC	State	
Pump Meter Calibration Repo	ort Pump Change Report	Facility PE Dent request	

Pump Product		t Test CC Adjusted		sted To	Gallons Mete	Gallons		
#		+	_	+	-	Before	After	Dispensed
	Diesel	+3	Slow			40759.8		
		٥	First				40767.8	10.8
Σ.	Diesel	- (5600			86500.7.7		
		2	Fast	1			36537.7	10.0
3	Unkertick	-1	260			102296.4		
		- 2	Fast				102306.4	10.0
4	Untereled	+3	Slow			48816.1		
		+2	Fast				48826.1	10.0
5_	Diesel	+.2	Slow			13305.4		
		-2	Fast				73315.4	10.0
وا	Diesel	Ô	5104			48055,8	4	
		- 4	Fast				48065.8	10.0

Calibrator	Keitt. Griffic
Contractor_	KrCs Petroleum Bervices

PA PREPARTY SARENCES IN

K & G PETROLEUM SERVICES, INC.

P.O. BOX 134 ST. LEONARD, MD. 20685-0134

Date	invoice #
9/22/2007	2514

Bill To

DELMARVA POWER VRM P.O. BOX 9239 MAILSTOP 79NC48 ATTN:SKIP PIERCE/ KATHY SYNDER NEWARK, DE. 19714 Site Serviced

BENNING
GVR ID 261240
3400 BENNING RD. N.E.
WASHINGTON, D.C. 20019

		P.(O, No.	Terms	Due Date
				NET 30	10/22/2007
Item	Description	Qty	Rate	Serviced	Amount
PEPCO/T Assistant Technician Assistant-o Service Tr Service ch Water abs Water findi SINGLE	Technician per hour Assistant per hour Technician per hour-overtime Assistant per hour-overtime Service truck per hour Service charge Water absorbent sheets Water finding paste 17" X 19" Oil absorbent sheet Scope of Work per attached signed service order#3024	4 4 0.75 0.75 4 8	40.00	8/29/2007	200.00 160.00 56.25 45.00 60.00 40.00 8.00 2.00 5.60
	Performed annual fuel island inspections of the Veeder Root and product dispensers. Note: The tank probe in the diesel tank is defective and needs replacement. Also, the TLS console communication parameters were turned off. I was able to get FMS personnel to turn them back on.				TETTO TO THE PERSON OF THE PER
	e your business! Contact us at 410-495-81 o@comcast.net	00 or	Subtota		
Parts and equ	ipment are warranted only to the extent of	the	0-1 T	(F 00/)	

Parts and equipment are warranted only to the extent of the manufacturer's warranty.

Sales Tax (5.0%)

Balance Due

Desile Chappin OK 70 Pag -> Walter N. Doner: 76010 5231522

CREDIT CART

Invoice



K & G PETROLEUM SERVICES, INC.

P.O. BOX 134 ST. LEONARD, MD. 20685-0134

Date	Invoice #
9/22/2007	2514

Bill To	Site Serviced				
DELMARVA POWER VRM P.O. BOX 9239 MAILSTOP 79NC48 ATTN:SKIP PIERCE/ KATHY SYNDER NEWARK, DE. 19714	, ,				
· · · · · · · · · · · · · · · · · · ·	P.O. No.	Terms	Due Date		
	F.O. No.	ienns	Due Date		
		NET 30	10/22/2007		

		7.0.140.		i Cillis	Due Date	
٠				NET 30	10/22/2007	
Item	Description	Qty	Rate	Serviced	Amount	
	Pump calibration reports attached with inspection report.					
	ate your business! Contact us at 410-495-81 tro@comcast.net	00 or	Subtota	ıt	\$576.85	

We appreciate your business! Contact us at 410-495-8100 or e-mail-kgpetro@comcast.net

Parts and equipment are warranted only to the extent of the manufacturer's warranty.

Subtotal

Sales Tax (5.0%)

Sales Tax (5.0%) \$0.00 **Balance Due** \$576.85

FUEL ISLAND COMPLIANCE

DELMARVA POWER VEHICLE RESOURCE MANAGEMENT TESTING PREVENTATIVE MAINTENANCE REPORT

2007 PEPCO HOLDINGS INC. VEHICLE RESOURCE MANAGEMENT VEHICLE FUEL ISLANDS COMPLIANCE INSPECTIONS and PREVENTATIVE MAINTENANCE

INSTRUCTIONS CONTRACT TECHNICIANS SERVICING FUEL ISLAND FACILITIES

1)	On arrival at the site inform site people who you and your personnel are and what your assignment is.	YES PLACE	X
2)	Ask the site staff for a contractor pass if a pass is required the contractor's staff must keep their pass exposed.	Ø	
3}	Inform the site people you will be testing fuel island sitent and auditable alarms.	囡	
4)	All safety rules & guide lines are to be followed. Personal Protective Equipment is to worn.		
5)	If the fuel island dispensers are to be Out of Service or the driveway area blocked inform the site staff first.	Ø	
6)	Defects / situations found during the site work needing prompt attention are to be reported to the site people. VRM and handled or stabilized during the work.	V	. \square
7)	Defects I situations found not requiring prompt attention are to be noted on the report with recommendations to resolve these.	囡	
8)	Inform Veeder Root of activities involving the Veeder Root systems before starting and when completed.	$\overline{\Box}$	

FUEL ISLAND COMPLIANCE

)	When leaving the site for any reason please inform the site staff of your leaving and your return time.	Ø	
0	Leave signed by the work performing techs completed copies of these forms in the Veeder Root Data Book.		四
1	Process signed by the work performing techs completed copies of these forms to the servicing contractor's home office for these copies to be held by the servicing contractor. And copies to be sent by the contractor's office staff along with the invoice for payment to the owners of the equipment serviced	$lue{lack}$	

COMPLIANCE TESTING PREVENTATIVE MAINTENANCE REPORT SITE ID#: 261240 SITE NAME: VEEDERROOT A 24421 **FUELFORCE** Keith Citter SERVICE COMPANY **TECHNICIAN** 1 INSPECTION OF PRODUCT DISPENSERS 1. Condition & operation of dispenser units, registers resets, on/off levers, logos & warning decals Inspected & Maintained - Operation: VOK Following Service Performed / Status : 12 Replace fuel filters & remove inspect & clean product strainers at each dispenser Inspected & Maintained - Operation: VOK Following Service Performed / Status : 13 Inspect, adjust or replace motor to pump drive belt & pulleys in each dispenser Inspected & Maintained - Operation: OK Following Service Performed / Status : 14 Condition of piping, check valves & all gaskets and conduit for tightness in each dispenser Inspected & Maintained - Operation: OK Following Service Performed / Status : 15 Dispenser covers, re-install to insure proper fit, security & safe operation of each dispenser Inspected & Maintained - Operation: OK Following Service Performed / Status : 16 Condition of dispenser pan for integrity, product, debris, water clean as needed Inspected & Maintained - Operation: VOK Following Service Performed / Status :

DELMARVA POWER VEHICLE RESOURCE MANAGEMENT

17 Condition of hoses, break-a-ways, swivels, couplings & retractors repair as needed

FUEL ISLAND

SITE NAME: BENNING	VEEDERROOT A 24421 FUELFORCE SITE ID #: 261241 DATE: 8/24/07	
Med to report hox	Settlector on dispuser Ty. Next to replace in severify nextles operate as required and are user friendly repair as needed	tens that facked during Pressul
19 Verify proper produ	OK Following Service Performed / Status . ct markings are on dispensers & pump numbers are legible OK Following Service Performed / Status :	
1.10 Calibrate dispenser Inspected & Maintained - Operation		
1.11 Verify dispenser Sta Inspected & Maintained - Operation	age 2 vapor recovery hardware is type certified for use on these dispensers OK Not OK follow up to provide certified hardware	

FUEL ISLAND

COMPENSACE LESTING PREVENTATIVE MAINTENANCE RE	.FORT
SITE NAME: BENNING SITE ID#: 26/24 DATE: 8/29/0)
VEEDERROOT A 2441	<u></u>
FUELFORCE	
SERVICE COMPANY KHG Patroleum TECHNICIAN Keth Gotton	
2 INSPECTION OF VEEDER-ROOT TLS350/350R SYSTEM	
21 Call Veederroot Operations prior to & after completion of inspections	
Inspected & Maintained - Operation: OK Following Service Performed / Status:	
2.2.1 Check console printer for operation & paper repair / replace as needed	2
Inspected & Maintained - Operation:	,,,,,
	-
Charles when status disclay and an distance assain as good and	
222 Check system status display report conditions repair as needed inspected & Maintained - Operation: OK Following Service Performed / Status:	
223 Print out the TLS inventories & verify with actual inventories report results to Veederroot for con	rection
Inspected & Maintained - Operation: OK Following Service Performed / Status :	
Diesel tank probe is not reading correct beight toward top section	of proce
	,
224 Print out and check TLS set up values verify these with known values & specifications	
Inspected & Maintained - Operation: VOK Following Service Performed / Status :	
TLS communication parameters were torned affe I had FINIS turn to	hem buck on
	4
22 s Verify battery back up is working repair as needed	
Inspected & Maintained - Operation: VOK Following Service Performed / Status :	

22.6 Test alarm to verify power, warning & alarm indicators lights. & alarm sounds repair as needed

FUEL ISLAND

SITE NAME: Benning	SITE ID#: 261240 VEEDERROOT A 24421 FUELFORCE	DATE:	8/29/27
SERVICE COMPANY K+C Petroke, Inspected & Maintained - Operation:		K., H. C., H., Status:	<u></u>
23.1 Verify epoxy packs on fiel Inspected & Maintained - Operation:	d wiring are in serviceable condition report of the condition of the condi		
24: Inspect containment sum Inspected & Maintained - Operation:	o for leakage around pump repair as ne OK Following Service Performed	eded / Status:	

3 of 9 Pages

DELMARVA POWER VEHICLE RESOURCE MANAGEMENT COMPLIANCE TESTING PREVENTATIVE MAINTENANCE REPORT

SITE NAME: Renning	SITE	10#: 36/240) _	DATE:	3/29/27
	VEEDERROOT FUELFORCE	A 24421			
SERVICE COMPANY Ktb Petroles	in	TECHNICIAN	Keits	L Gotto	
24.2 Inspect sensor cables and Inspected & Maintained - Operation:	• · · · · · · · · · · · · · · · · · · ·	•	ed / Statu	s:	
2.43 Verify epoxy packs on field Inspected & Maintained - Operation:					
2.5.) Inspect over fill sensor to Inspected & Maintained - Operation:		s freely repair as nn ng Service Performe		ıs :	
252 Turn liquid sensor upside Inspected & Maintained - Operation:		ne monitor liquid alar ng Service Perlorma			as needed
253 Verify sensor is re-position Inspected & Maintained - Operation:					
254 Verify epoxy packs on fiel Inspected & Maintained - Operation:					

DELMARVA POWER VEHICLE RESOURCE MANAGEMENT

FUEL ISLAND

	COMPLIANCE	SING PREVENTAL	IAC MUNICIA	ANCE REPURI
SITE NAME: Bennin		TE ID#: 26/240	DATE :	8/25/07
	VEEDERROO FUELFORCE	OT A 24421		•
SERVICE COMPANY	to Petroleum	TECHNICIAN K	A Coffe	· ·7
3.1 Verify o	ce Fuel Force Management Synondition & proper operation of fuel of the Company of	el island terminal key pad	& display includin Status :	g display heater
	ondition of fuel island terminal er - Operation: OK Follow			we foreign debris
	uel Force program is running - g i - Operation: OK Follo			
	ppropriate RED indicator light on I - Operation:			zed
	ppropriate green indicator light of a comparation:			ile is turned on
	ppropriate yellow indicator light of the operation:			1

2.4.4 Verify all indicator lights on 4-hose board go off when dispenser handle (lever) is turned off

FUEL ISLAND

SITE NAME: Benning	SITE ID#: 261240	DATE:	8/29/07
,	VEEDERROOT A 24421	-	
	FUELFORCE	-	•
SERVICE COMPANY Ktic Petrolicu Inspected & Maintained - Operation:	TECHNICIAN TECHNICIAN TOK Following Service Performed (Keith Cortha	
mepotice inclination operation.	John Charles and Control of Contr		
2 4 5 Check operation of Fuel F Inspected & Maintained - Operation:	Force terminal cooling fan, clean or repla OK Following Service Performed /		·
34.6 Verify the Fuel Force term Inspected & Maintained - Operation:	ninal back up power supply (UPS) is in w OK Following Service Performed /		

5 of 9 Pages

_		101	4416	
rı	JEŁ	. 15L	QNA.	ŧ

SITE NAME: Ben	n _{[m} (TEID#: 26/2	40	DATE:	8/29/07
	VEEDERROO FUELFORCE	110117	- ·		, , , , , , , , , , , , , , , , , , , ,
SERVICE COMPANY	K+6 Potokum	TECHNICIAN	Kcı	the God	(in
347 Veri Inspected & Maintai	fy key activated By-Pass system will ned - Operation: VOK Follo	work lube By-Pass ving Service Perfor	key lock med / Stal	tus:	

COMPLIANCE TESTING PREVENTATIVE MAINTENANCE REPORT SITE ID#: 26/240 SITE NAME: VEEDERROOT A 2442 **FUELFORCE** SERVICE COMPANY **TECHNICIAN** 4 Inspection of Ancillary Equipment Remove STP sump covers & insure all is in good condition, clean of product, water, liquids & debris Inspected & Maintained - Operation. OK Following Service Performed / Status 4.2 Remove all manhole covers (probe ports) to insure these are clean, free of liquids & debris Inspected & Maintained - Operation: OK Following Service Performed / Status 4.3 Inspect all wring & connections within sumps/manholes for proper sealing, absence of conosion Inspected & Maintained - Operation: VOK Following Service Performed / Status: 4.4 Verify proper operation of all overfill alarms & valves repair as needed Inspected & Maintained - Operation: OK Following Service Performed / Status 45 Verify integrity of all spill buckets these are clean of products, water, any figures and debris Inspected & Maintained - Operation. OK Following Service Performed / Status 4.6 Verify all fill port covers are proper color & markings in accordance with the API 1637 codes Inspected & Maintained - Operation: VOK Following Service Performed / Status: 47 Verify all ground cover caps for proper sealing to prevent surface water & other debris from entering Inspected & Maintained - Operation: OK | Following Service Performed / Status:

DELMARVA POWER VEHICLE RESOURCE MANAGEMENT

FUEL ISLAND

SITE NAME: Bennin	VEEDERR	SITE ID#: 261240 100T <u>A 24421</u> ICE	DATE: 8/29/3)
SERVICE COMPANY K	Gol Petrokun	TECHNICIAN	with Costin	
	all fuel island lighting for prop - Operation: OK Fo			
	el island Emergency Stop (E-S			

7 of 9 Pages

DELMARVA POWER VEHICLE RESOURCE MANAGEMENT COMPLIANCE TESTING PREVENTATIVE MAINTENANCE REPORT

SITE NAME:	Berning	SIT	EID#: <i>261241</i>	DATE:	8/24/07
		VEEDERROO1	1 A 24421		
		FUELFORCE			
SERVICE CO	OMPANY KHE PET	rokum	TECHNICIAN	Keith. Grit	fin
Inspected	4.1.0 Verify the E-Stop system of the system				nt any deficiencies
Inspecte	4 1,1 Confirm fire extingui d & Maintained - Operation:				
	4.1.2 Verify all required do				
	d & Maintained - Operation:		ing Service Performe	d / Status :	No date book
locat	ed out TLS co	nsde			
					<i>*</i>
Incocoto	41.3 Perform tests & re-ord & Maintained - Operation:				
	lestormed by o		ing Service Ferforme	u / Sialus .	
	religince by an	PLA I			
	4 1.4 Hydrostatic test spill	huckets record tests	results and inform a	ulborities as require	ed by the state
	Test Performed - Pass			usitorii do do raquit	
N/A	Provide wri	ten docummentation 1	or test procedure and	testing results	
7	<u> </u>	· · · · · · · · · · · · · · · · · · ·			
	415 Hydrostatic test US	T sumos record tests	results and inform a	ithorities as require	d by the state
	Test Performed - Pass				
NA	Provide wri	tten docunmentation t	for test procedure and	testing results	
				-	
	4 · 6 Hydrostatic test disp	senser sumns record	tests results and info	rm authorities as re	equired by the state
عداده	Test Performed - Pass			THE COLINE	
NIV		tten docunmentation	for test procedure and	testing results	

DELMARVA POWER VEHICLE RESOURCE MANAGEMENT COMPLIANCE TESTING PREVENTATIVE MAINTENANCE REPORT SITE ID#: 361240 SITE NAME: VEEDERROOT A 2442 **FUELFORCE** SERVICE COMPANY **TECHNICIAN** 4.1 & Hydrostatic test UST sumps, record tests results and inform authorities as required by the state Test Performed - Passed Test - Failed Provide written documentation for test procedure and testing results 412 Product line testing Test Performed - Passed Test - Failed Provide written documentation for test procedure and testing results 4.17 Test Cathodic Protection system Test Performed - Passed Test - Failed Provide written documentation for test procedure and testing results

8 of 9 Pages

DELMARVA POWER VEHICLE RESOURCE MANAGEMENT COMPLIANCE TESTING PREVENTATIVE MAINTENANCE REPORT SITE ID #: 26 240 SITE NAME: VEEDERROOT A 24421 **FUELFORCE** SERVICE COMPANY K. G Petroleum TECHNICIAN 5 Waste generation & disposal 51 All wastes are to be removed & disposed of in accordance with federal, state & local regulations Inspected & Maintained' - Operation: VOK Following Service Performed / Status : 5.2 Verify the existence and the date of special certificates/permits Inspected & Maintained - Operation: OK Following Service Performed / Status : Ned not final 5.3 Verify the API sign is present & legible Inspected & Maintained - Operation: OK Following Service Performed / Status : 54 Verify Cathodic Protection records are timely Inspected & Maintained - Operation: OK Following Service Performed / Status . s.s. Verify all materials utilized during this event are recorded on these inspection sheet & invoice Inspected & Maintained - Operation: VOK Following Service Performed / Status : s.e Verify all Stage II materials utilized during this event are system correct & recorded

57 Inspect the fuel island area for the presence of a plastic drum containing spill clean up materials

REPORT

FUEL ISLAND

Inspected & Maintained - Operation: VOK Following Service Performed / Status: A garage

9 of 9 Pages

Attachment 6. K&G Petroleum Services, Inc. Maintenance Records For Replacing Diesel Tank Probe

K & G PETROLEUM SERVICES, INC. 200 Sandhill Court St. Leonard, MD 20685 Phone 410-495-8100 Fax 410-495-7888

> Start Time: 8:00 and Site arrive: 9:00 and depart: 10:30 and End Time: 10:30 and

Phone		Date of Order			
PO#		Réquested by Date			
Job Name	Pepco	Benni	ng 2610	24	
Job Address		Benning	,		
		urton Di			
Contact		Job Phone			

9/20/07 Description of Work Replaced existing diesel tank probe with new 11 tank probe as existing probe levels were off from actual product level in tenk when above 80% of tank's egacity.

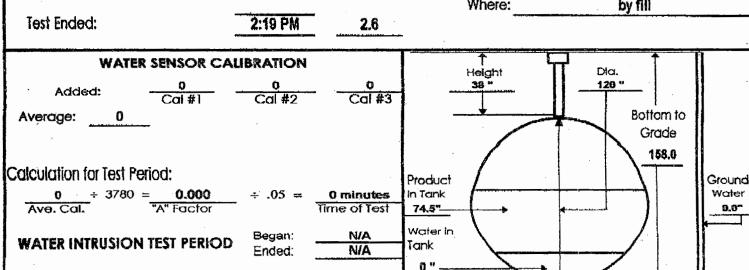
Also at request of Pepes personnel (FMS) was not notified pror to removing probe in order to verify that the system when in also would prompt (FMS) to contact Pepes personnel and Service Contractor to request service for site. Also contacted "Clean Fiels" to come to site and clean out water from bottom of diesel tout.

Qty.	Material	Material	Material	Labor	Labor
		Price	Amount	Hrs. Rate	Amount
1	Veeder-Root 11 may ph	s probe			MANAGER MANAGEMENT
}	Veeder-Root 11 may ph Veeder-Root 4" desel A	ant kit			
	Water Finding paste				
J _	Wester Finding paste 17"x15" of absorbent sh	xt			
·.				Total Labor	
· · · · · · · · · · · · · · · · · · ·				Total Materials	
M298K4G	A CONTRACTOR OF THE CONTRACTOR		_	Tax	
Authori	zed Signature <u>X.J.</u>	internal of	**************************************	Total	

Attachment 7. Precision Testing, Inc. Tank Tightness Testing Results for Gasoline Tank

EZY 3 LOCATOR PLUS PRESSURE CALCULATION & WATER SENSOR CALIBRATION DATA SHEET MANUFACTURED BY: ESTABROOK'S INC. 1-877-368-7215 Thursday, June 07, 2007 DATE PB\$ # (NEW YORK) TANK # Buffhide 19976 TOTAL TANK VOL. Pepco Benning 14437 LOCATION PRODUCT VOL. 5539 3400 Benning Road NE · ULLAGE VOL Regular Washington, DC PRODUCT TYPE PRESSURE SENSOR CALCULATION PSI (1) 1.936 WEIGHT OF PRODUCT PSI (2) .036 0.000 0.0 INCHES OF WATER IN TANK PSI (3) Line 1 + Line 2 = Total Positive Head Pressure in Tank = 1.936 .036 PSI (4) 0.000 INCHES OF WATER OUTSIDE TANK +/-PSI(5)Total Head Pressure Minus Outside Water Pressure **PSI (6)** 0.500 Always add .5 PSI NOTE: If Line 6 is Less Than .5 PSI Line 7 Shall be .5 PSI +/-PSI (7) 2,436 **TEST PRESSURE ACOUSTIC TEST TIME** TIME PRESSURE

Blower Started:	1:55 PM	0.0			,
Test Pressure Reached:	2:11 PM	2.4	Depth of Ground	water Determined:	,
Blower Turned Off:	2:16 PM	2.6	_		
Test Began:	2:17 PM	2.6	Ву:	1-4" well	
			Where:	by fill	



May-08

May-08

In-Tank Microphone

Pressure Sensor

M321003

L001190

Attachment 8. Proof of Financial Assurance

ASSOCIATED ELECTRIC & GAS INSURANCE SERVICES LIMITED

Endorsement No. 32	Effective Date of Endorsement October 31, 2007				
Attached to and forming part of POLICY	No. X2660A1A07				
NAMED INSURED Pepco Holdings, Inc.					
It is understood and agreed that this DO	LICV is hereby amended as indicated. All other	torms and conditions of			

this POLICY remain unchanged.

EMPINANTE BURNE PROPERTY PROPE A RESPONSIBILITY ENDORSEMENT

DECLARATIONS

Item UST1:

Name of each covered location:

(See Section 3)

B. Address of each covered location:

(See Section 3)

Item UST2:

Policy Number: X2660A1A07

Item UST3: SAMAGEMENT CONTROL OF THE SAME OF THE SAME

Item UST4:

A. Name of Insurer:

Associated Electric & Gas Insurance Services Limited

B. Address of Insurer:

One Church Street, P.O. Box HM2455, Hamilton, HMJX BERMUDA

Item UST5:

A. Name of Insured: - Conectiv

- Potomac Electric Power Company

B. Address of Insured:

800 King Street Wilmington, DE 19801

 701 Ninth Street, N.W. Washington, DC 20068

INSURING AGREEMENT

 This Endorsement certifies that the POLICY to which the Endorsement is attached provides liability insurance covering the underground storage tank(s) listed in Section 3 to this Endorsement for taking corrective action and/or compensating third parties for BODILY INJURY and PROPERTY DAMAGE caused by accidental release; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the POLICY; arising from operating the underground storage tanks identified Section 3.

The limits of liability of the Insurer's liability are:

\$1,000,000

each OCCURRENCE; and

\$3,000,000

annual aggregate exclusive of legal defense costs, which are subject to a separate

limit under the POLICY.

8224 (6/2006)

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

This coverage is provided under POLICY No. X2660A1A07 The effective date of said POLICY is October 31, 2007

- 2. The insurance afforded with respect to such OCCURRENCES is subject to all of the terms and conditions of the POLICY; provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e):
 - Bankruptcy or insolvency of the INSURED shall not relieve the Insurer of its obligations under the POLICY to which this Endorsement is attached.
 - b. The Insurer is liable for the payment of amounts within any deductible applicable to the POLICY to the provider of corrective action or a damaged third-party, with a right of reimbursement by the INSURED for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95 - 280.102.
 - c. Whenever requested by a Director of an implementing agency, the Insurer agrees to furnish to the Director a signed duplicate original of the POLICY and all endorsements.
 - d. Cancellation or any other termination of the insurance by the Insurer except for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the INSURED. Cancellation for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after expiration of a minimum of ten (10) days after a copy of such written notice is received by the INSURED.
 - e. The insurance covers CLAIMS otherwise covered by the POLICY that are reported to the Insurer within six months of the effective date of cancellation or non-renewal of the POLICY except where the new or renewed POLICY has the same retroactive date or a retroactive date earlier than that of the prior POLICY, and which arise out of any covered OCCURRENCE that commenced after the POLICY retroactive date, if applicable, and prior to such POLICY renewal or termination date. CLAIMS reported during such extended reporting period are subject to the terms, conditions, limits, including Limits of Liability, and exclusions of the POLICY.

3.

Address	· .	Number of Tanks
1st and V Street, SW		2
Washington, DC 20024		
3400 Benning Road, NE		4
Washington, DC 20019		
3302 15 th Street, SE		1
Washington, DC 20020		
4600 Sangamore Rd.		1
Bethesda, MD 20816		
P. O. Box		1 .
Newburgk MD 29795		
8300 Old Marlboro Pike	. ,	6
Upper Marlboro, MD 20772		
	1 st and V Street, SW Washington, DC 20024 3400 Benning Road, NE Washington, DC 20019 3302 15 th Street, SE Washington, DC 20020 4600 Sangamore Rd. Bethesda, MD 20816 P. O. Box Newburgk MD 29795 8300 Old Marlboro Pike	1 st and V Street, SW Washington, DC 20024 3400 Benning Road, NE Washington, DC 20019 3302 15 th Street, SE Washington, DC 20020 4600 Sangamore Rd. Bethesda, MD 20816 P. O. Box Newburgk MD 29795

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

Name of Covered Location	A	nen i
Brighton Substation	Address	Number of Tanks
	1300 Brighton Dam Road	1
Rockville Service Center	Brighton, MD 20833	
Nockville Service Ceffer	1600 Gaither Road	5
Allert on a	Rockville, MD 20850	
Atlantic City Operations	Grant & Missouri	2
	Atlantic City, NJ 08401	
Pleasantville Operations	2542 Fire Road	2
	Egg Harbor Twp., NJ 08234	
Salem Operations	Fifth Street	3
•	Salem, NJ 08079	
New Salem Operations	RR 3, Box 48	2
	Woodstown, NJ 08098	
Clementon Office	25 Park Blvd.	1
	Clementon, NJ 08098	
Glassboro Operations	428 Ellis Street	9
	Glassboro, NJ 08028	
Winslow Operations	295 N. Grove Street	Ż
÷	Berlin, NJ 08009	
Missouri Avenue Station	Missouri & Grant Aves.	1
	Atlantic City, NJ 08401	
Bridgeton Operations	10 Cohansey Street	2
r .	Bridgeton, NJ 08301	
Cape May Court House Operations	420 Route 9 North	2
	CMCH, NJ 08210	2
Administrative Complex	Fire Road and Rt. 322	3
•	Egg Harbor Township, NJ 08232	2
Transportation Center	Duerer Street	
•	Cologne, NJ 08213	6
Carll's Comer Peaker Station	Burlington, & Central Rds.	
	Carll's Corner, NJ	5
Cedar Station	Rt. 9	•
	Manahawkin, NJ 08050	3
Mickleton Station	Harmony Rd., E of Rt. 130	
	Mickleton, NJ 08056	2
West Creek	457 Main Street	
, , , , , , , , , , , , , , , , , , ,		2
Middle Station	West Creek, NJ 08092 Railroad Station	
		. 4
Deepwater Generating Statin	Rio Grande, Nj 08425	
Copract Constaining Statin	373 N. Broadway	. 1 ,
Midtown Thermal Control Center	Bennsville, NJ 08070	
wildown Thermal Control Center	1825 Atlantic Avenue	4
	Atlantic City, Nj	



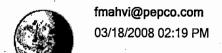
UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

Name of Covered Location	<u>Address</u>	Number of Tanks
Centerville District Office	Route 213 & Route 13	2
	Centerville, MD 21616	
Bay Regional Office	Naylor Mill Road & Route 13	1
	Salisbury, MD 21802	
Control Center	10611 Westlake Drive	3
	Rockville, MD	
Exmore Operations	4174 Lankford Hwy.	. 2
	Exmore, VA 23350	

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97 (b) (1) and that the Insurer is eligible to provide insurance as an excess or surplus lines insurer in one or more States.

AEGIS Insurance Services, Inc. Authorized Representative of: Associated Electric & Gas Insurance Services Limited 1 Meadowlands Plaza East Rutherford, New Jersey 07073

Signature of Authorized Representative



To Jan Szaro/R3/USEPA/US@EPA

bcc

Subject Re: Follow up to UST Inspections conducted on 2/5/08

M	r	S	za	r٥	٠

Please find attached the following documents in response to your inquiries:

1. Substation Number 136 - Facility ID# 8000608

A letter from a qualified third party (K&G Petroleum, Inc.) certifying that the valve is functioning properly:

Site photos of the valve:

2. Benning Road Generating Station - Vehicle Resource Management - Facility ID # 7000585

Results of annual line leak testing for both tanks. Apparently there was a problem with the system as was noted below by the Veeder - Root representative, but was corrected and the test was done on 3/6/08.

"Milton, Carrie" <carrie.milton@gilbarco.com>

03/12/2008 10:15 AM

To <andrew.ross@pepcoholdings.com>

Subject 261240 PHI

In looking at the history of the lines and how they were testing, both the Regular product and the Diesel product lines were not testing properly via the TLS. The test for the .2 periodic,

was timing out and not allowing the .1 annual to test to run. Since the manual test was programmed and performed on 03/06/2008, the line has been able to test as normal on its own. We do have a passing result for the .1 annual line test as of 03/06/2008 for the year. If you have any other questions and concerns please call me. Thanks

Carrie R. Milton Gilbarco/Veeder Root Compliance Analyst (336) 315-2705

Regards

Fariba Mahvi PEPCO Environment Management Services (202) 331-6641 Office (202) 345-7647 Cell

Szaro.Jan@epamail.epa.gov

03/05/2008 12:00 PM

To fmahvi@pepco.com

CC

Subject Follow up to UST Inspections conducted on 2/5/08

Ms. Mahvi,

Following up on our phone conversation of this morning. Two inspections were conducted at PEPCO facilities on 2/5/08.

1) Substation Number 136 - Facility ID# 8000608

Please provide documentation, photographs or current documentation from a qualified third party, that the ball float valve being used for overfill protection is still intact and providing its function. Been 12 years since the ball float installation and there have been documented failures of these devices.

2) Benning Road Generating Station - Vehicle Resource Management - Facility ID# 7000585

Documentation of passing 0.1 gal/hr line leak tests was provided for both of the UST systems for tests conducted on 2/23/07. This type of testing requires either a passing 0.1 gal/hr annual test or passing 0.2 gal/hr monthly tests. Please provide documentation of current line leak testing that these two UST systems are in compliance.

Per our discussion, this documentation will be provided by Friday March 14th. After tomorrow, I will be out of the office until March 17th. If you'll be providing the documentation by fax please hold it until March 17th so that I'll be in the office, if by email then send it any time.

Thank you,

Jan Szaro, Environmental Engineer
US Environmental Protection Agency, Region 3
RCRA Compliance and Enforcement Branch (3WC31)
1650 Arch Street
Philadelphia, PA 19103
Phone: (215) 814-3421

Fax: (215) 814-3163

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any liability in respect of such communications. pepco alabama ave - pic 1.bmp pepco alabama ave - pic 2.bmp





pepco alabama ave - pic 3.bmp | Sub 136 - Ball Float Valve0001.pdf | 2008 Line Testing.pdf

FMS Site Compliance Report

GVR ID: 261240

Site Id: Benning

Period: 03/01/2008 to 03/07/2008

Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Passed

Site: PHI Service Company VRM # 1

3400 Benning Rd NE Washington, DC 20019

Report Created: 03/07/2008 08:49 AM

Tank Release Detection Results

UNLEADED

THINK THOMBO TO CLOCK IN THE PRINCE		•			
Tank Product	Test Date	Туре	Full Vol	Result	
1 DIESEL	03/06/2008	0.2 GPH Monthly	59%	Passed	
2 UNLEADED	03/06/2008	0.2 GPH Monthly	60%	Passed	
Line Release Detection Results			•		
Line Product	Test Date	Type	·.	Result	. J
1 , DIESEL	03/06/2008	0.1 GPH Annual		Passed	

0.1 GPH Annual

03/06/2008

This report documents tank and line tests performed at the above location for the indicated date and period. This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

VR101: Page 1 of 1

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420

Telephone: 1-800-997-7725

FMS Site Compliance Report

Period: 03/01/2008 to 03/07/2008

GVR ID: 261241 Site Id: Kenilworth

Customer: PHI Service Company VRM

PO Box 9239

Newark, DE 19714

Normal

Site: PHI Service Company VRM

3400 Benning Rd NE Washington, DC 20019

Report Created: 03/07/2008 08:49 AM

Tank Release Detection Results

STP Sump

Tank	Product	Test Date	Туре	Full Vol	Result	·
1	UNLEADED	03/04/2008	0.2 GPH Monthly	70%	Passed	:
Line R	telease Detection Results				:	
Line	Product	Test Date	Туре		Result	
1 .	UNLEADED	03/03/2008	0.2 GPH Monthly		Passed	/
Sensor	Status					
Senso	or Category	Sensor Label	Test Date		Status	

UNLEADED STP SUMP

03/04/2008

This report documents tank and line tests performed at the above location for the indicated date and period.

This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

VR101: Page 1 of 1